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April 24, 2023

VIA ECF

The Honorable John G. Koeltl
United States District Judge
United States Courthouse, Courtroom 14A
500 Pearl Street
New York, NY 10007

Re: *Grant et al. v. Trump et al.*
Case No. 1:20-cv-07103-JGK

Dear Judge Koeltl,

This firm represents defendants Donald J. Trump and Donald J. Trump For President, Inc. in the above-referenced action. We write with consent from plaintiffs Edmond Grant p/k/a “Eddy Grant”, Greenheart Music Limited, a United Kingdom Limited Company, and Greenheart Music Limited, an Antigua and Barbuda Limited Company and pursuant to Your Honor’s Individual Practices Rule I.E. to request a 45-day extension of time for Defendants to take the deposition of Plaintiffs’ expert, Lewis Stark. Defendants’ counsel sent an email to Plaintiffs’ counsel requesting Mr. Stark’s availability for deposition on March 24, 2023, requesting availability the weeks of April 10 and 17, well prior to the expert discovery deadline. Plaintiffs’ counsel responded via email the same day stating that they were speaking with Mr. Stark and would revert shortly with available dates. We have not heard from Plaintiffs’ attorneys until today, when they consented to a 45-day extension and promised to reach out to Mr. Stark for his availability.

This is the second request for an extension of the expert discovery schedule. The prior extension was ordered on February 10, 2023.

We thank the Court for its attention to this matter.

Respectfully,

Darren W. Saunders

DWS/ji
cc: All counsel of record (via email)